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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
: :
DBSD NORTH AMERICA, INC., *et al.*,¹ : Case No. 09-13061 (REG)
: :
Debtors. : (Jointly Administered)
: :
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**NOTICE OF FILING OF DECLARATION OF STEPHEN BLAUNER IN RESPONSE
TO (I) THE DEBTORS' MOTION FOR ENTRY OF AN ORDER AUTHORIZING AND
APPROVING THE INVESTMENT AGREEMENT AND (II) THE DEBTORS' MOTION
FOR ENTRY OF AN ORDER (A) AUTHORIZING THE DEBTORS TO OBTAIN
REPLACEMENT POSTPETITION FINANCING ON A THIRD LIEN, SECURED,
AND SUPERPRIORITY BASIS AND (B) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT attached hereto as Exhibit A is the Declaration of
Stephen Blauner in Response to (I) the Debtors' Motion for Entry of an Order Authorizing and
Approving the Investment Agreement and (II) the Debtors' Motion for Entry of an Order (A)

¹ The debtors in these chapter 11 cases, together with the last four digits of each debtor's federal tax identification number, are: DBSD North America, Inc. (6404); 3421554 Canada Inc. (4288); DBSD Satellite Management, LLC (3242); DBSD Satellite North America Limited (6400); DBSD Satellite Services G.P. (0437); DBSD Satellite Services Limited (8189); DBSD Services Limited (0168); New DBSD Satellite Services G.P. (4044); and SSG UK Limited (6399) (collectively, the "Debtors"). The service address for each of the Debtors is 11700 Plaza America Drive, Suite 1010, Reston, Virginia 20190.

Authorizing the Debtors to Obtain Replacement Postpetition Financing on a Third Lien, Secured, and Superpriority Basis and Granting Related Relief (the "Blauner Declaration").

PLEASE TAKE FURTHER NOTICE THAT attached as Attachment I to the Blauner Declaration is a copy of the letter proposal from Solus Alternative Asset Management LP and Harbinger Capital Partners LLC (the "Alternative Bidders") to DBSD North America, Inc., dated February 28, 2011, including a plan term sheet and a proposal for replacement postpetition financing, wherein the Alternative Bidders set forth the material terms and conditions of an alternative restructuring for the Debtors.

Dated: March 1, 2011
New York, New York

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